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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JUL - 3 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

The North American Numbering Council's (NANC)
Recommendations on the North American Numbering
Plan Administrator, Billing and Collection Agent,
And Related Rules

CC Docket No. 92-237

**REPLY COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY,
PACIFIC BELL AND NEVADA BELL ON THE NORTH AMERICAN NUMBERING
PLAN ADMINISTRATOR AND BILLING AND COLLECTION AGENT**

Southwestern Bell Telephone Company (SWBT), Pacific Bell (Pacific) and Nevada Bell (Nevada) hereby submit these Reply Comments on the Recommendation on the North American Numbering Council (NANC) regarding the North American Numbering Plan Administrator (NANPA) and Billing and Collection Agent. SWBT, Pacific and Nevada reemphasize their position as submitted in their Comments in this proceeding that the Commission must choose Mitretek Systems (Mitretek) as the new NANPA.

A total of thirteen parties filed comments in this proceeding. Eleven of those parties addressed the issue of who should be chosen as the new NANPA. Nine of the eleven parties stated that Mitretek should be chosen as the new NANPA. These nine parties represent a broad spectrum of industry interests. They include a public utility commission, a regional bell operating company (RBOC), an interexchange carrier (IXC), two wireless entities and two associations. Obviously, these entities have many diverse interests, however, all agree that Mitretek must be chosen as the new NANPA because the NANPA job is critical to the entire

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industry and Mitretek is the only entity properly staffed to perform the job. All of these parties urge the Commission not to consider the NANC's split vote of 13 to 11 as a recommendation for Lockheed Martin Corporation (Lockheed), particularly because the NANP Working Group, the most informed and knowledgeable body, preferred Mitretek. All the parties ask the Commission to perform an independent review and are confident that following an independent review, the Commission will award the job to Mitretek.

MCI was the only party filing comments in support of Lockheed. MCI's comments are inaccurate and must be disregarded. MCI offers two "reasons" to choose Lockheed over Mitretek. First, MCI states that Lockheed should be chosen because "further delays to numbering administration reform clearly outweigh any potential benefits from 'tweaking' the recommendations".¹ The Commission must recognize that the parties filing comments to support Mitretek are not tweaking the recommendations. Rather, this broad group of affected entities is expressing serious concern about the ability of Lockheed to perform the critical tasks of central office code administration and area code relief management. These concerns must be taken seriously given the fact that two of the entities are new entrants, the very group the telecommunications act of 1996 (Act) is designed to protect. In addition, the two association groups supporting Mitretek represent a broad range of cellular and PCS providers and have also expressed serious concern about Lockheed's ability to meet their members' needs.

MCI's second "reason" to support Lockheed is that "Lockheed's selection will also enable number 'exhaust' problems, which are accelerating the pace of NPA relief activities (area

¹MCI Comments, page 8.

code splits, overlays, etc.) to be administered ‘more cost effectively’.”² This statement is also inaccurate. Area code exhaust is not a situation that can be administered more effectively unless there are sufficient resources to deal with area code relief issues. The vast majority of parties filing comments in this proceeding have stated that they have no confidence in Lockheed’s proposed staffing levels. Further, MCI’s position that Lockheed will be “more cost effective” is also unsupportable. Lockheed’s proposal to achieve efficiency with number exhaust problems by merging four of seven number portability administration centers and potentially the new NANPA under one company is unproven and completely speculative. In short, there is no assurance that Lockheed will be more efficient or cost effective than Mitretek and many concerns that Lockheed will be unable to handle the job in an accurate and timely manner.

For all the foregoing reasons, SWBT, Pacific and Nevada respectfully request that the Commission designate Mitretek as the new NANPA.

²MCI Comments, page 12.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By Marjorie Morris Weisman

Robert M. Lynch
Durward D. Dupre
Mary W. Marks
Marjorie Morris Weisman

One Bell Center
St. Louis, MO 63101
(314) 235-2507

PACIFIC BELL AND NEVADA BELL

Marlin D. Ard
Nancy C. Woolf

140 New Montgomery Street, Room 1522A
San Francisco, California 94105
(415) 542-7657

Margaret E. Garber

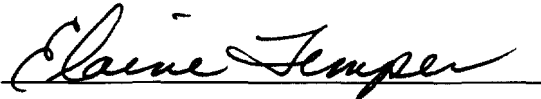
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
(202) 383-6435

Their Attorneys

July 3, 1997

Certificate of Service

I, Elaine Temper, hereby certify that the Reply Comments of Southwestern Bell Telephone Company, Pacific Bell and Nevada Bell on the North American Numbering Plan Administrator and Billing and Collection Agent CC Docket No. 92-237 has been served this 3rd day of July, 1997 to the Parties of Record.

A handwritten signature in cursive script, reading "Elaine Temper", is written over a horizontal line.

Elaine Temper

July 3, 1997

EDWARD R WHOLL
CAMPBELL L AYLING
NEW ENGLAND TELEPHONE &
TELEGRAPH COMPANY
111 WESTCHESTER AVE
WHITE PLAINS NY 10604

MARGERET E GARBER
PACIFIC TELESIS
1275 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20004

FLOYD S KEENE
LARRY A PECK
MARK R ORTLIEB
AMERITECH
2000 W AMERITECH CENTER DRIVE
ROOM 4H86
HOFFMAN ESTATES IL 60196-1025

COLEEN M EGAN HELMREICH
U S WEST INC
1020 19TH STREET NW
SUITE 700
WASHINGTON DC 20036

M ROBERT SUTHERLAND
BELLSOUTH CORPORATION
1155 PEACHTREE ST NE
SUITE 1700
ATLANTA GEORGIA 30309-3610

JAMES P TUTHILL
NANCY C WOOLF
PACIFIC TELESIS
140 NEW MONTGOMERY STREET
ROOM 1523
SAN FRANCISCO CA 94105

LINDA D HERSHMAN
SOUTHERN NEW ENGLAND
TELECOMMUNICATIONS CORP
227 CHURCH STREET
NEW HAVEN CONNECTICUT 06510

M DE B BROWN
PACIFIC TELESIS
130 KEARNY STREET
ROOM 3659
SAN FRANCISCO CA 94108

DAVID L MEIER
DIRECTOR-LEGISLATIVE & REGULATORY
PLANNING
CINCINNATI BELL
201 E 4TH STREET
PO BOX 2301
CINCINNATI OHIO 45201

ROY L MORIS
ALLNET
1990 M STREET NW
SUITE 500
WASHINGTON DC 20036

DARRELL S TOWNSLEY
ILLINOIS COMMERCE COMMISSION
160 NORTH LASALLE STREET
SUITE C-800
CHICAGO IL 60601

JOSEPHINE S TRUBEK
ROCHESTER TELEPHONE CORPORATION
180 SOUTH CLINTON AVENUE
ROCHESTER NEW YORK 14646

ANGELA BURNETT
INFORMATION INDUSTRY ASSOC
555 NEW JERSEY AVENUE NW
SUITE 800
WASHINGTON DC 20001

ALEX J HARIS
TELEPORT
ONE TELEPORT DRIVE
STATEN ISLAND NY 10311-1011

PAUL RODGERS
CHARLES D GRAY
JAMES BRADFORD RAMSAY
NARUC
1102 ICC BUILDING
PO BOX 684
WASHINGTON DC 20044

JAMES L CASEY
AIR TRANSPORT ASSOCIATION
OF AMERICA
1301 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20004

JOHN L BARTLETT
ROBERT J BUTLER
AERONAUTICAL RADIO INC
1776 K STREET NW
WASHINGTON DC 20006

DANIEL L BRENNER
DAVID L NICOLL
NCTA
1724 MASSACHUSETTS AVENUE NW
WASHINGTON DC 20036

DAVID C HENNY
WHIDBEY TELEPHONE COMPANY
2747 E STATE HIGHWAY 525
LANGLEY WASHINGTON 98260-9799

ALBERT H KRAMER
ROBERT F ALDRICH
AMERICAN PUBLIC COMMUNICATIONS
COUNCIL
1201 NEW YORK AVENUE NW
PENTHOUSE SUITE
WASHINGTON DC 20005-3919

A A KURTZE
CENTEL CORPORATION
8725 HIGGING ROAD
CHICAGO IL 60631

DAVID COSSON
NTCA
2626 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20037

MARK H GOLDBERG
UNITEL COMMUNICATIONS INC
200 WASHINGTON STREET WEST
TORONTO ONTARIO CANADA M5V 3C7

WERNER K HARTENBERGER
JG HARRINGTON
LAURA H PHILLIPS
DOW LOHNES & ALBERTSON
1255 23RD STREET SUITE 500
WASHINGTON DC 20037

DAVID J GUDINO
GTE SERVICE CORPORATION
1850 M STREET NW
SUITE 1200
WASHINGTON DC 20036

ITS INC
1919 M STREET NW
ROOM 246
WASHINGTON DC 20054

LORETTA J GARCIA
DONALD J ELARDO
MCI TELECOMMUNICATIONS CORP
1801 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20006

PETER GUGGINA
ROBERT W TRAYLOR JR
CONSULTANTS FOR MCI
2400 N GLENVILLE DRIVE
RICHARDSON TX 75082

JOHN M GOODMAN
KAREN ZACHARIA
ATTORNEYS FOR BELL ATLANTIC
1133 20th ST NW
Washington, D.C. 20036

MARK R HAMILTON
MARSHA OLCH
MCCAW CELLULAR COMMUNICATIONS INC
5400 CARILLON POINT
KIRKLAND WA 98033

JAMES S BLASZAK
FRANCIS E FLETCHER JR
ATTORNEYS FOR AD HOC TELECOMM
USERS COMMITTEE
GARDNER CARTON & DOUGLAS
1301 K STREET NW
SUITE 900 - EAST TOWER
WASHINGTON DC 20005

MARK C ROSENBLUM
ROY E HOFFINGER
JUDY SELLO
ATTORNEYS FOR AT&T CORP
295 N MAPLE AVENUE
ROOM 3244J1
BASKING RIDGE NJ 07920-1092

R MICHAEL SENKOWSKI
JEFFREY S LINDER
WILEY REIN & FIELDING
1776 K STREET NW
WASHINGTON DC 20006

H R BURROWS
NETWORK RESOURCE RESEARCH
F4 160 ELGIN STREET
OTTOWA ONTARIO CANADA K1G 314

ANDREW D LIPMAN
RUSSELL M BLAU
SWIDLER & BERLIN CHARTERED
3000 K STREET NW
WASHINGTON DC 20007

JAY C KEITHLEY
LEON KESTENBAUM
NORINA T MOY
SPRINT CORPORATION
1850 M STREET NW SUITE 1100
WASHINGTON DC 20036

MARY MCDERMOTT
ASSOCIATE GENERAL COUNSEL
USTA
1401 H STREET NW STE 600
WASHINGTON DC 20005-2136

W RICHARD MORRIS
SPRINT CORPORATION
PO BOX 11315
KANSAS CITY MO 64112

ALBERT H KRAMER
ROBERT F ALDRICH
KECK MAHIN & CATE
1201 NEW YORK AVENUE NW
PENTHOUSE SUITE
WASHINGTON DC 20005-3919

WILLIAM J COWAN
NEW YORK STATE DEPARTMENT OF
PUBLIC SERVICE
THREE EMPIRE STATE PLAZA
ALBANY NY 12223

JONATHAN D BLAKE
ELLEN K SNYDER
COVINGTON & BURLING
1201 PENNSYLVANIA AVENYUE NW
PO BOX 7566
WASHINGTON DC 20044

CARL WAYNE SMITH
CHIEF REGULATORY COUNSEL
TELECOMMUNICATIONS (DOD)
CODE AR
DEFENSE INFORMATION SYSTEMS
AGENCY
701 S COURTHOUSE ROAD
ARLINGTON VIRGINIA 22204

MICHAEL G HOFFMAN ESQ
VICE PRESIDENT
LEGAL & REGULATORY AFFAIRS
VARTEC TELECOM INC
3200 WEST PLEASANT RUN ROAD
LANCASTER TEXAS 75146

W THEODORE PIERSON JR
RICHARD M METZGER
COUNSEL FOR ALTS
PIERSON & TUTTLE
1200 NINETEENTH STREET NW
SUITE 607
WASHINGTON DC 20036

HEATHER BURNETT TOLD
PRESIDENT-ALTS
1200 19TH STREET NW
SUITE 607
WASHINGTON DC 20036

DR LEE L SELWYN
ECONOMICS AND TECHNOLOGY INC
ONE WASHINGTON MALL
BOSTON MASSACHUSETTS 02108

DAVID J GUDINO
1850 M STREET NW
SUTIE 1200
WASHINGTON DC 20036

LEONARD J KENNEDY
LAURA H PHILLIPS
RICHARD S DENNING
ATTORNEYS FOR NEXTEL
COMMUNICATIONS INC
DOW LOHNES & ALBERTSON
1255 23RD STREET NW
WASHINGTON DC 20037

RICHARD A ASKOFF
ATTORNEY FOR THE
NATIONAL EXCHANGE CARRIER
ASSOCIATION INC
100 SOUTH JEFFERSON ROAD
WHIPPANY NJ 07981

ROY L MORRIS
REGULATORY COUNSEL FOR
ALLNET COMMUNICATION
SERVICES INC
1990 M STREET NW SUITE 500
WASHINGTON DC 20036

M ROBERT SUTHERLAND
SHIRLEY A RANSOM
ATTORNEYS FOR BELLSOUTH
TELECOMMUNICATIONS INC
4300 SOUTHERN BELL CENTER
675 WEST PEACHTRE STREET NE
ATLANTA GEORGIA 30375

RAYMOND G BENDER JR
J G HARRINGTON
ATTORNEYS FOR VANGUARD CELLULAR
SYSTEMS INC
DOWN LOHNES & ALBERTSON
1255 23RD STREET NW SUITE 500
WASHINGTON DC 20037

CINDY Z SCHONHAUT ESQ
VICE PRESIDENT
GOVERNMENT AFFAIRS
MFS COMMUNICATIONS COMPANY
INC
3000 K STREET NW
SUITE 300
WASHINGTON DC 20007

ANDREW LIPMAN
ATTORNEY FOR MFS
SWIDLER & BERLIN CHARTERED
3000 K STREET NW
SUITE 300
WASHINGTON DC 20007

B C SCHUR
RATES PLANNING AND
REGULATORY SUPPORT
STENTOR RESOURCE CENTRE INC
160 ELGIN ST FLOOR 22
OTTAWA ONTARIO K1G3J4

DAVID A GROSS
WASHINGTON COUNSEL FOR
AIRTOUCH COMMUNICATIONS
1818 N STREET NW
WASHINGTON DC 20036

PAMELA J RILEY
DIRECTOR-PUBLIC POLICY
AIRTOUCH COMMUNICATIONS
ONE CALIFORNIA ST 28TH FL
SAN FRANCISCO CA 94111

THOMAS E TAYLOR
CHRISTOPHER J WILSON
ATTORNEYS FOR CINCINNATI BELL
TELEPHONE COMPANY
2500 PNC CENTER
201 EAST FIFTH STREET
CINCINNATI OHIO 45202

JULIA A WAYS DORF
SWIDLER & BERLIN
COUNSEL FOR TELCO COMMUNICATION
GROUP
3000 K ST NW
WASHINGTON, D.C. 20007

JEANNIE GRIMES
FCC
COMMON CARRIER BUREAU
2000 M STREET NW STE 235
WASHINGTON DC 20554
(2 COPIES)